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To be filed under seal pursuant to the court's September 23, 2020 Order

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007-1312

Re: United States v. Orsini Qunitero, 19 Cr. 144 (AKH)

Hon. Hellerstein:

Mr. Orsini Quintero does not, at this time, intend to make further objections to the government's under seal filings of three letters; (two on September 22 and one on September 23, collectively, the "govt. ltrs.") which were provided to us in their entirety. His position is informed by the government's representation that these "sealing" issues may well be moot given the scheduled presentment of Mr. Marin today in the Southern District of Florida. Gov't Sealed Ltr. at 1-2 (Sept. 23, 2020); Telephonic Conf. Tr ("Conf. Tr.") at 18:8-12 (Sept. 23, 2020). Litigation about sealing may also be academic as government agents executed a search at Mr. Marin's aviation company this week, and his arrest was public.

We continue to object to the delay in Mr. Marin's presentment. Initial presentment should be both speedy and public. Nothing about Mr. Marin's COVID-19 test results is an impediment to such a telephonic presentments which are now routine. This is especially so given the muddled record on Mr. Marin's medical condition. See, footnote 1 of the government's 9/23/20 letter. The government has voiced no other continuing concern or impediment to a public presentment. Their prior unspecified and inchoate concerns of safety seem to have dissipated and those concerns have not been confirmed by either counsel or the family of the confidential source.

We ask the Court to ensure that the public docket reflects the filing of the government's "sealed" submissions. Mr. Orsini intends to file a half-sheet indicating this sealed letter to the Court. We do not believe sealing is required, but accede to the Court's rulings on the issue.

Respectfully submitted,

/s/Sabrina P. Shroff
Counsel for Mr. Orsini Quintero

cc: Counsel for the government & Mr. Coro Mones
(Counsel for Mr. Leon may not have received the sealed filings and is not copied here)